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JOHN M. PELKEY
ADMITTED IN D.C. AND VA

December 29, 1997

OUR FILE NO
1554-101-63

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

DEC 29 1997

Re: MM Docket No. 97-229
RM-9100
Warrenton, North Carolina and LaCrosse, Virginia

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Transmitted herewith, on behalf of MainQuad, Inc., are an original and four copies of its Comments and Counterproposal in the above-referenced rulemaking proceeding.

Kindly communicate any questions concerning this matter directly to this office.

Sincerely,

John M. Pelkey

JMP/ned

Enclosures: (5)

01/12
11/12

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 97-229
Table of Allotments)	RM-9100
FM Broadcast Stations)	
Warrenton, North Carolina and)	
LaCrosse, Virginia)	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

RECEIVED

JUL 29 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Comments and Counterproposal
of MainQuad, Inc.**

By Petition for Rulemaking filed May 15, 1997, MainQuad, Inc. ("MainQuad"), permittee of WXNC(FM), Warrenton, NC, requested that the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's rules, the Table of FM Allotments, by deleting Channel 279C2 from Warrenton, North Carolina, and allotting that channel to LaCrosse, Virginia, as that community's first local aural service. MainQuad additionally requested that WXNC's construction permit be modified to specify LaCrosse as the station's community of license. In response, the Commission released a *Notice of Proposed*

Rulemaking in the above-captioned proceeding proposing the requested changes to the Table of Allotments and soliciting the submission of comments by December 29, 1997. *See Notice of Proposed Rulemaking*, MM Docket No. 97-229 (adopted October 29, 1997, released November 7, 1997) (the “NPRM”).

MainQuad, through counsel, hereby submits its Comments in response to the *NPRM*. Through these Comments, MainQuad is propounding a Counterproposal to the proposal set forth in the *NPRM*. Specifically, MainQuad is now requesting the allotment of Channel 297A to Powhatan, Virginia (and the concurrent modification of the WXNC construction permit to specify Powhatan as the station’s community of license), and the allocation of Channel 297A to Enfield, North Carolina. Both requested allocations would provide first local aural transmission service to the communities in question.

As will be shown below, MainQuad’s Counterproposal is consistent with Commission policy and would advance the public interest. Accordingly, MainQuad’s Counterproposal should be adopted.

I. Background - MainQuad’s Petition for Rulemaking.

MainQuad is the permittee of Radio Station WXNC(FM), Warrenton, North Carolina. The station has been authorized to operate on Channel 297C2. In its Petition for Rulemaking, MainQuad proposed

to change its community of license from Warrenton to LaCrosse, Virginia, consistent with the procedures authorized in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*New Community Rulemaking*").

II. MainQuad's Counterproposal.

Shortly after MainQuad filed its Petition for Rulemaking, it discovered that the Commission's decision in MM Docket No. 96-167 had become final. *Powhatan and Goochland, Virginia*, 12 FCC Rcd 3191 (1997). In that decision, the Commission decided to award Channel 263A to Goochland, Virginia, rather than Powhatan, Virginia. In so doing, the Commission found that, although Powhatan is a community for allocation purposes, the allocation of the channel to Goochland, rather than Powhatan, would better serve Section 307 of the Communications Act of 1934, as amended, and thus awarded the channel to Goochland - - thus leaving Powhatan without a local aural transmission service. MainQuad's Counterproposal would remedy this deficiency.

As the Commission found in MM Docket 96-167, Powhatan has a population of 900 persons.¹ 12 FCC Rcd at 3192. In addition, it has a

¹ By comparison, LaCrosse has a population of only 549 persons. See *MainQuad Petition for Rulemaking* at 2.

local newspaper, a post office, a fire department, a library, a rescue squad, a Planning and Development Office, a number of religious institutions, and social and civic organizations (including a Chamber of Commerce, Moose Lodge, 4-H Clubs and Jaycees) and businesses. *Id.* Powhatan serves as the county seat of Powhatan County. It has no local broadcast transmission service, however. MainQuad's Counterproposal would remedy this defect.²

Moreover, by reallocating Channel 297 from Warrenton to Powhatan and changing WXNC's status from Class C2 to Class A, the Commission can allocate an additional Class A facility on Channel 297 to Enfield, North Carolina. Enfield is an incorporated town of 3,082 persons, according to the 1990 census. The town is governed by a Mayor and Board of Commissioners. It has its own library, police department, fire department and rescue squad. It is home to numerous businesses, including car dealerships, a pharmacy, two banks, a farm equipment company, a fertilizer company and restaurants. Enfield is the oldest town in Halifax County, having been founded in 1740. The town boasts one public middle school, one elementary school and a private day

² As is explained in the attached "Technical Statement", WXNC, operating from the Powhatan reference site, would place a city-grade signal over a sparsely populated portion of the Richmond Urbanized Area. Because this area constitutes less than 3 percent of the Richmond Urbanized Area, no "Tuck" analysis is required. See *Littlefield, Wolfforth and Tahoka, Texas*, 12 FCC Rcd 3215, 3217 (1997).

school. Medical needs for Enfield residents are handled by two local doctors and a dentist.

Despite Enfield's status, however, it has no radio station of its own. MainQuad's Counterproposal would eliminate this deficiency by adding Channel 297A to the Commission's Table of Allocations as Enfield's first local broadcast transmission service.

As is demonstrated in the attached "Technical Statement" prepared by Graham Brock, Inc., the allocation of Channel 297A to Powhatan, Virginia, and the allocation of Channel 297A to Enfield, North Carolina, can be accomplished in full compliance with the spacing and coverage requirements established in the Commission's rules.

III. MainQuad's Counterproposal is Consistent With Commission Policy and is in the Public Interest.

In its *New Community Rulemaking*, the Commission held that petitions requesting a change in community of license would be approved if the change would not have the effect of depriving a community of an existing service representing its sole local transmission outlet and if the allotment to the new community would serve the Commission's allotment priorities and policies more effectively than the allotment to the old

community.³ MainQuad's Counterproposal meets both criteria and thus should be granted.

First, the reallocation of Channel 297 would not deprive Warrenton of its sole local transmission outlet inasmuch as Warrenton would retain local aural transmission service from AM Station WARR, a fact noted by the Commission in the *NPRM*.⁴

Second, the Counterproposal would far better serve the Commission's allotment priorities and policies than the current allotment to Warrenton. The Counterproposal would permit the creation of first local aural transmission service for two communities, one of which is substantially larger than Warrenton. Specifically, the grant of MainQuad's Counterproposal would provide for the first local transmission service for Powhatan, Virginia, a community of 900 persons and first local transmission service to Enfield, North Carolina, whose population of 3,082 persons is more than three times Warrenton's population of 949 persons. The Commission has found that such service is the highest of the Commission's existing allocation priorities: "[T]here are virtually no populated areas of the country where our higher allotment priorities, such as first reception service, have not been attained. Therefore, as a practical matter, provision of first local service

³ 5 FCC Rcd at 7094.

⁴ See *NPRM* at para. 2.

is the highest of our allotment priorities which remains in any significant degree unsatisfied.”⁵ In addition, the MainQuad Counterproposal would result in the provision of service to many more people than the current allocation. Operating from the proposed Powhatan allocation site, WXNC would provide service to 197,245 persons. The proposed Enfield facility would provide service to an additional 77,097 persons. Thus, the two facilities would serve a total of 274,342 persons. By contrast, the currently authorized WXNC construction permit would result in service to 146,729 persons. Operating with the facilities proposed in a facilities modification application filed on December 9, 1997, WXNC would serve 155,723 persons.⁶ Moreover, the service from WXNC is only potential service and not a service upon which the public has come to rely. As the Commission recognized in the *NPRM*, the removal of potential service from a community does not pose the same concerns that loss of service from an operating station would represent.⁷ Finally, an engineering study of the Counterproposal has revealed that the reallocation would

⁵ 5 FCC Rcd at 7096 (para 16).

⁶ See File No. 971209IC.

⁷ *NPRM* at para. 3.

not cause the creation of white or gray area to be created within the “loss” area.⁸

IV. MainQuad’s Commitments

MainQuad hereby states its intention to file a modification application for WXNC to specify operation on Channel 297A at Powhatan if that channel is allotted and, if authorized, to build the station promptly. In addition, MainQuad hereby commits to file an application requesting authority to construct a new FM station on Channel 297A at Enfield, North Carolina, if that channel is allotted and, if authorized, to build that station promptly.

V. Conclusion

In summary the Counterproposal would better serve the public interest than the current allocation of Channel 297C2 to Warrenton. The Counterproposal would permit two communities to receive their first local aural transmission service, thereby serving the highest of the Commission’s existing allocation priorities, while not resulting in Warrenton’s loss of its only transmission service. In addition, the Counterproposal would permit more persons to receive service than if the

⁸ For purposes of FM allotments, a white area is a geographical area that is not served by any full-time aural service and a gray area is one that is served by only one full-time aural service. *Greenup, Kentucky and Athens, Ohio*, 4 FCC Rcd 3843, 3847n.4 (1989), *aff’d in relevant part*, 6 FCC Rcd 1493 (1991), *appeal dismissed sub nom.*, *WATH, Inc., v. FCC*, D.C. Cir. No. 91-1268 (September 26, 1991).

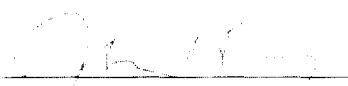
current allocation to Warrenton is retained. These facts demonstrate that the grant of MainQuad's Counterproposal is in the public interest. Accordingly, MainQuad respectfully requests the following amendments to the FM Table of Allotments:

City	Present Allotment	Proposed Allotment
Warrenton, North Carolina	297C2	None
Powhatan, Virginia	None	297A
Enfield, North Carolina	None	297A

Respectfully submitted,

MainQuad, Inc.

By:


John M. Pelkey
Its Attorney

HALEY BADER & POTTS P.L.C.
Suite 900
4350 North Fairfax Drive
Arlington, VA 22203-1633

703/841-0606

Date: December 29, 1997

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

COUNTER PROPOSAL
MM DOCKET # 97-229
MAINGUAD, INC.
WXNC RADIO STATION
RE-ALLOT CHANNEL 297A
POWHATAN, VIRGINIA
December 1997

TECHNICAL EXHIBIT

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COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
WXNC RADIO STATION
RE-ALLOT CHANNEL 297A
POWHATAN, VIRGINIA
December 1997

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of MainQuad, Inc. ("Main"), permittee of station WXNC, Channel 297C2, Warrenton, North Carolina.¹ Main is also the Petitioner in MM Docket # 97-229 seeking the re-allotment of Channel 297C2 from Warrenton to La Crosse, Virginia. Main herein requests Channel 297A be re-allotted to Powhatan, Virginia, as Powhatan's first locally licensable service, in lieu of its original proposal. It is further requested that WXNC be ordered to change channels and community of license and that its outstanding construction permit be modified to reflect Channel 297A at Powhatan, Virginia. The proposed allocation at Powhatan is mutually exclusive with the authorized WXNC facility at Warrenton.

2. As a result of the relocation of WXNC to Powhatan, Virginia, it is feasible to allot Channel 297A to Enfield, North Carolina, as that community's first local service. Channel 297A is presently precluded from allotment to Enfield due to the authorized construction permit for WXNC on Channel 297C2 at Warrenton, North Carolina. Enfield, located in southern Halifax County, North Carolina, has no locally licensed AM or FM facilities.

1) WXNC is presently unconstructed and not providing service to Warrenton, North Carolina.

DISCUSSION

3. Powhatan, Virginia, is an unincorporated community located in Powhatan County, Virginia. While Powhatan, Virginia, is not listed in the U.S. Census, it has previously been shown to be a community for allocation purposes.² Powhatan has a population of 900 persons.³ Presently, there are no local AM or FM services licensed to the community. Therefore, the allocation of Channel 297A to Powhatan will provide the first locally licensable service to the community.

4. Powhatan is not immediately adjacent to any urbanized area. The closest urbanized area is Richmond, Virginia. As shown on Exhibit #1, the city grade of WXNC, operating from the reference site for Channel 297A at Powhatan, Virginia, as a maximum Class A facility, will only deliver city grade service (70 dBu) to less than 3% of the Richmond Urbanized Area.⁴ This proposed re-allotment is therefore not a migration from a rural area to a suburban area, but rather from one rural area to another. The removal of WXNC from Warrenton will not deprive Warrenton of its only service, since AM station WARR will remain licensed to Warrenton.

5. The incorporated community of Enfield, North Carolina, is located in southern Halifax County, North Carolina, and has a population of 3,082 persons.⁵ Enfield has an elected governing

2) In MM Docket #96-167 David Layne sought the allotment of Channel 263A to the community of Powhatan. While the Commission ultimately allotted Channel 263A to Goodland, Virginia (which was a counterproposal filed in MM Docket #96-167), it did note that based on data submitted to the Commission by Layne, Powhatan was a community for allocation purposes (Report and Order MM Docket #96-167, DA 97-339, adopted March 12, 1997, released March 21, 1997).

3) Comments on David Layne, MM Docket #96-167.

4) The city grade contour from the proposed Powhatan reference site will envelop a small portion of the Richmond Urbanized Area in the Clover Hill Division in the immediate vicinity of Swift Creek Reservoir. This area, because of its location adjacent to the Pocahontas State Forest, is sparsely populated.

5) 1990 U.S. Census figures.

body, consisting of a Mayor and Board of Commissioners. It has its own library, fire and police departments and rescue squad. There are numerous businesses and residential areas in Enfield. Enfield, the oldest town in Halifax County, was founded in 1740 and has all of the necessary identia for community status.

REQUEST

6. Channel 297A can be allotted to Powhatan, Virginia, with a site restriction of 10.0 kilometers southeast of the community to avoid shortspacing WRQX, Channel 297B, Washington, DC, and WUMX, Channel 298A, Charlottesville, Virginia, at reference coordinates North Latitude 37° 28' 02" and West Longitude 77° 51' 10. Attached as Exhibit #2 is a usable area map for Channel 297A at Powhatan, Virginia. Further, attached as Exhibit #3 is a §73.207 spacing study which shows Channel 297A, at the proposed allocation site, is fully spaced to all other licensed, applied for or proposed facilities (with the exception of WXNC and Main's own proposed La Crosse proposal). A 3.16 mV/m signal will be delivered to Powhatan, Virginia, from the proposed reference site.

7. Based on the proposed allocation site at Powhatan and the relocation of WXNC to Powhatan, Channel 297A can be allotted to Enfield, North Carolina, at reference coordinates North Latitude 36° 11' 09" and West Longitude 77° 41' 40". This represents a site restriction of 1.3 kilometers northwest of the community to avoid shortspacing WNCT, Channel 300C, Greenville, North Carolina. Exhibit #4 is a usable area map denoting where Channel 297A could be allotted to Enfield, North Carolina (once WXNC is relocated to Powhatan). Exhibit #5 is a §73.207 spacing study for Channel 297A at Enfield, North Carolina, and shows the channel will

meet the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities (with the exception of the authorized WXNC construction permit). A 3.16 mV/m contour will be delivered to Enfield, North Carolina, from the proposed allocation site, and does not conflict with the proposed Channel 297A at Powhatan, Virginia.

8. Therefore, MainQuad, Inc., proposes the following changes to §73.202(b) of the Commission's rules:

Powhatan, Virginia

<u>Present</u>	<u>Proposed</u>
None	297A

Enfield, North Carolina

<u>Present</u>	<u>Proposed</u>
None	297A

PUBLIC INTEREST ASPECTS

9. The relocation of Channel 297 from Warrenton, North Carolina, to Powhatan, Virginia, will allow WXNC to provide Powhatan with its first locally licensed FM facility. Once relocated, WXNC on Channel 297A could provide service to 197,245 persons in 2,509.8 square kilometers.⁶ In addition to the ability of WXNC to provide first local service to Powhatan, the relocation will allow for allocation of Channel 297A to Enfield, North Carolina. Based on the

6) According to 1990 Census figures, the currently authorized WXNC construction permit would provide service to 146,729 persons. In a proposed modification of construction permit, File #ARN-971209IC, WXNC would provide service to 155,723 persons.

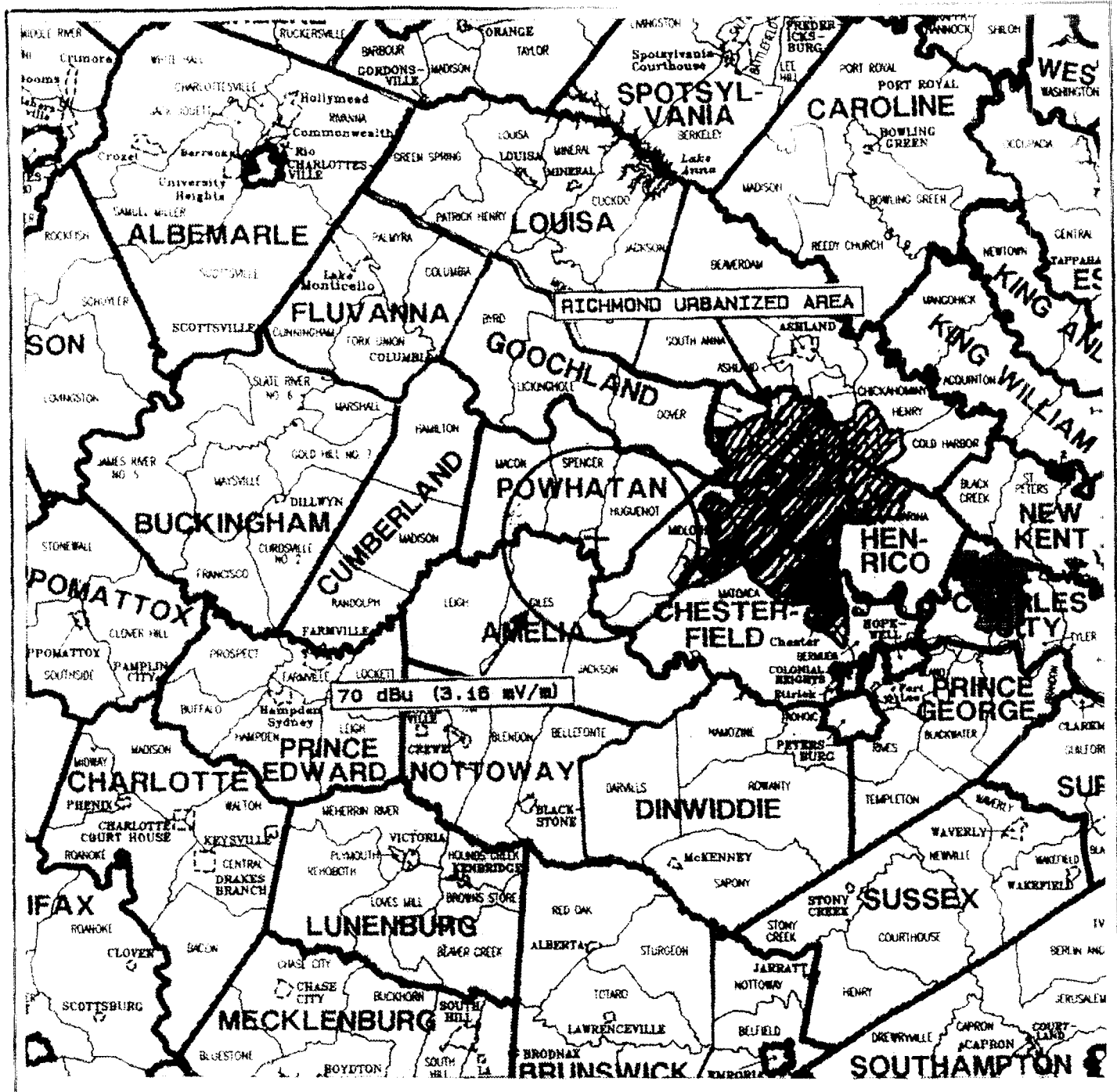
proposed allocation site for Channel 297A at Enfield, North Carolina, Channel 297A could potentially provide service to 77,097 persons in 2,509.6 square kilometers.⁷ Both allocations can be made without depriving Warrenton of potential FM service.⁸

10. When Channel 297A is allotted to Powhatan, Virginia, Main will file a minor change application to modify the outstanding WXNC construction permit to specify operation on Channel 297A at Powhatan. Further, Main will file, during the appropriate window period, an expression of interest or application, whichever is necessary, requesting authority to construct a new FM station on Channel 297A at Enfield, North Carolina.

11. This technical statement and attachments were prepared on behalf of MainQuad, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating FM allocations, licensed, applied for or proposed facilities was extracted from the NTIA FM database, as updated on December 19, 1997. We assume no liability for errors or omissions in that database which may be adverse to the request contained herein.

7) See Footnote 5 *supra*.

8) AM Station WARR is presently licensed to Warrenton, North Carolina. The relocation of WXNC to Powhatan, Virginia, would not deprive the community of its only local service.



DEPICTION OF URBANIZED AREA

MAP IS A COMPOSITE OF THE G-4, G-5, G-7
AND G-8 U.S. CENSUS MAPS OF THE STATE OF
VIRGINIA.

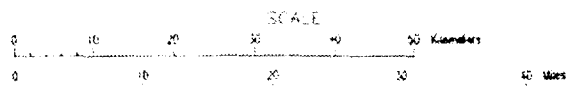
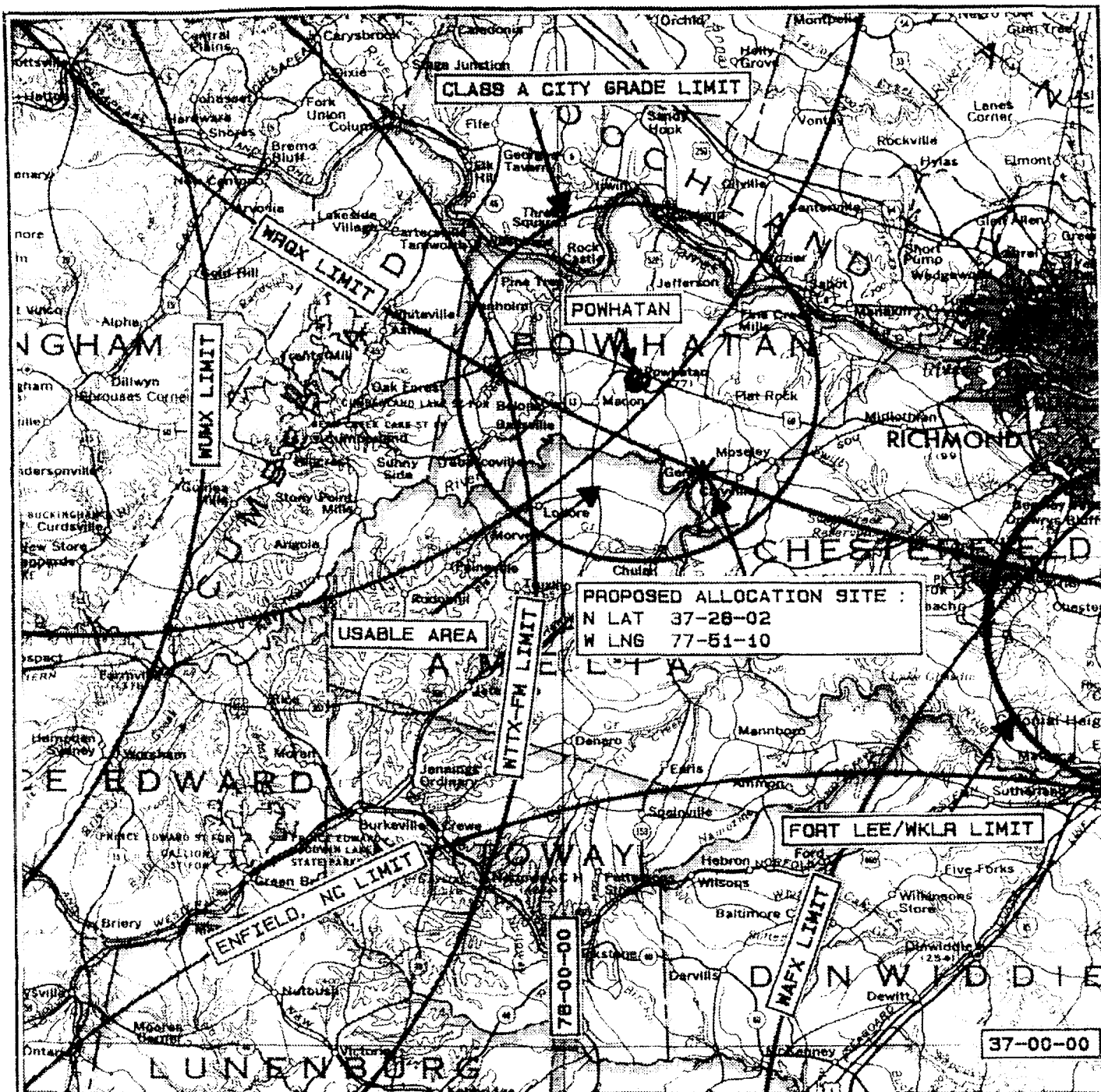


EXHIBIT #1

COMMENT & COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
RE-ALLOT CHANNEL 297A
POWhatan, VIRGINIA
December 1997

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

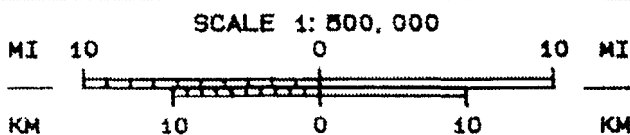


USABLE AREA CHANNEL 297A

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE MAP OF VIRGINIA.

EXHIBIT #2

COMMENT & COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
RE-ALLOT CHANNEL 297A
POWHATAN, VIRGINIA
December 1997



GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR POWHATAN, VIRGINIA
USING PROPOSED ALLOCATION SITE AS REFERENCE SITE

REFERENCE	CLASS A	DISPLAY DATES
37 28 02 N	Current rules spacings	DATA 12-19-97
77 51 10 W	CHANNEL 297 -107.3 MHz	SEARCH 12-26-97

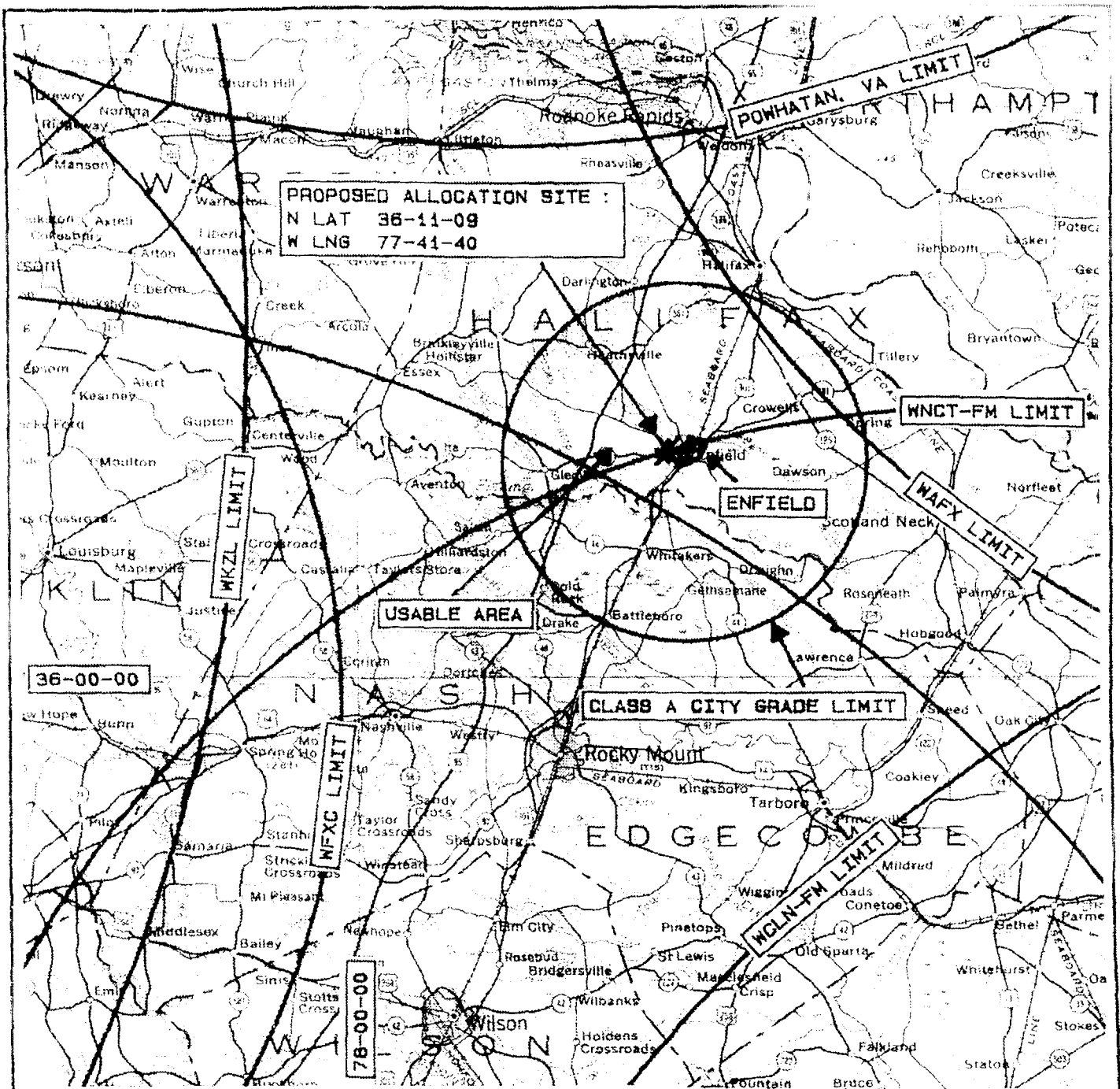
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD297	297A	Powhatan	VA	0.0	0.00	115.0	-115.00
AD	37 28 02	77 51 10	0.000 kW	0M	0.0	71.5	
MainQuad, Inc.							
> counterproposal MM Docket #97-229							
DE297	297C2	Warrenton	NC	184.2	95.24	166.0	-70.76
DE	36 36 41	77 55 55	0.000 kW	0M	59.2	103.2	
MainQuad, Inc.							
WXNC.C	297C2	Warrenton	NC	184.2	95.24	166.0	-70.76
CP CN	36 36 41	77 55 55	50.000 kW	150M	59.2	103.2	
Johnny Draper							
WRQX	297B	Washington	DC	22.0	178.00	178.0	0.00
LI CN	38 57 01	77 04 47	34.000 kW	184M	110.6	110.6	
WMAL, Inc.							
WUMX	298A	Charlottesville	VA	316.4	79.75	72.0	7.75
LI CN	37 59 05	78 28 49	0.210 kW	338M	49.6	44.8	
Spectrum Broadcasting Corporation							
WTTXFM	296A	Appomattox	VA	263.3	87.59	72.0	15.59
LI CN	37 22 19	78 50 06	3.000 kW	91M	54.4	44.8	
H T B, Inc.							
WTTXFM	296A	Appomattox	VA	263.3	87.59	72.0	15.59
CP CN	37 22 19	78 50 06	1.700 kW	130M	54.4	44.8	
CLL, Inc.							
ALOPEN	243B	Fort Lee	VA	109.8	41.55	15.0	26.55
AL N	37 20 24	77 24 41	0.000 kW	0M	25.8	9.3	
MM Docket #90-67 - Reserved for WKLR							
WKLR.A	243B	Fort Lee	VA	109.8	41.81	15.0	26.81
AP CN	37 20 22	77 24 31	50.000 kW	138M	26.0	9.3	
ABS Communications, L.L.C.							

CHANNEL 297A SPACING STUDY

EXHIBIT #3
COMMENT & COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
RE-ALLOT CHANNEL 297A
POWHATAN, VIRGINIA
December 1997

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



USABLE AREA MAP CHANNEL 297A

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE MAP OF NORTH CAROLINA.

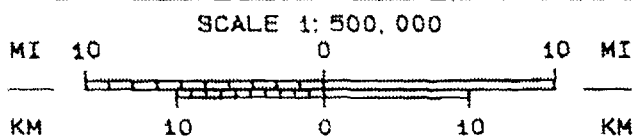


EXHIBIT #4

COMMENT & COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
RE-ALLOT CHANNEL 297A
POWhatan, VIRGINIA
December 1997

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR ENFIELD, NORTH CAROLINA
USING ALLOCATION PROPOSED SITE AS REFERENCE

REFERENCE
36 11 09 N
77 41 40 W

CLASS A
Current rules spacings
CHANNEL 297 -107.3 MHz

DISPLAY DATES
DATA 12-19-97
SEARCH 12-26-97

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD297	297A	Enfield	NC	0.0	0.00	115.0	-115.00
AD	36 11 09	77 41 40	0.000 kW	0M	0.0	71.5	
MainQuad, Inc.							
> counterproposal to MM Docket # 97-229							
WXNC.C	297C2	Warrenton	NC	335.9	51.81	166.0	-114.19
CP CN	36 36 41	77 55 55	50.000 kW	150M	32.2	103.2	
Johnny Draper							
BPH-930309MK							
DE297	297C2	Warrenton	NC	335.9	51.81	166.0	-114.19
DE	36 36 41	77 55 55	0.000 kW	0M	32.2	103.2	
MainQuad, Inc.							
RM-9100							
WNCTFM	300C	Greenville	NC	163.4	95.01	95.0	0.01
LI CN	35 21 55	77 23 38	100.000 kW	518M	59.0	59.0	
WNCT License LTD							
BLH-811124BN							
WCLNFM	297C3	Clinton	NC	209.9	146.81	142.0	4.81
LI CN	35 02 14	78 29 56	13.000 kW	138M	91.2	88.3	
Christian Listening Network							
BLH-940801KE							
WAFX	295C	Suffolk	VA	50.4	108.63	95.0	13.63
LI CN	36 48 16	76 45 17	100.000 kW	300M	67.5	59.0	
Radio Ventures I, L.P.							
BLH-890929KC							
AD297	297A	Powhatan	VA	354.4	142.90	115.0	27.90
AD	37 28 02	77 51 10	0.000 kW	0M	88.8	71.5	
MainQuad, Inc.							
> counterproposal to MM Docket #97-229							
WFXC	296A	Durham	NC	257.4	103.65	72.0	31.65
LI CN	35 58 41	78 48 59	2.600 kW	153M	64.4	44.8	
Lee W. Shubert, Trustee							
BLH-930720KA							
WKZL	298C	Winston-Salem	NC	273.5	202.20	165.0	37.20
LI ZCN	36 16 33	79 56 27	100.000 kW	303M	125.7	102.6	
Dick Broadcasting Company, Inc.							
BLH-921016KD							

ALLOCATION STUDY CHANNEL 297A

EXHIBIT #5
COMMENT & COUNTERPROPOSAL
MM DOCKET # 97-229
MAINQUAD, INC.
RE-ALLOT CHANNEL 297A
POWHATAN, VIRGINIA
December 1997

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

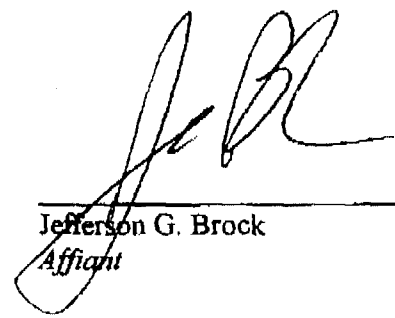
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by MainQuad, Inc., permittee of Radio Station WXNC, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

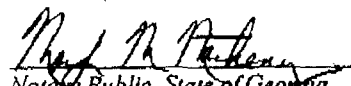
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 29th day of December, 1997.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 29th day of December, 1997*



Notary Public, State of Georgia
My Commission Expires: September 12, 1999